

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: ACandS, Inc. Armstrong World Industries, Inc. Combustion Engineering, Inc. The Flintkote Company Kaiser Aluminum Corp. Owens Corning US Mineral Products Company USG Corp. W.R. Grace & Co. Debtors.	Case No.: 02-12687 – D.I. 3639, 3645, 3646, 3648 Case No.: 00-4471 – D.I. 10698, 10706, 10707, 10709 Case No.: 03-10495 – D.I. 3380, 3386, 3387, 3389 Case No.: 04-11300 – D.I. 5606, 5643, 5646, 5662 Case No.: 02-10429 – D.I. 10009, 10018, 10019, 10023 Case No.: 00-3837 – D.I. 20954, 20962, 20963, 29064, 20966 Case No.: 01-2471 – D.I. 3878, 3884, 3885, 3887 Case No.: 01-2094 – D.I. 12596, 12604, 12605, 12607 Case No.: 01-1139 – D.I. 26053, 26137, 26146, 26195
---	--

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: Mid-Valley, Inc. North American Refractories Co. Pittsburgh Corning Corp. Debtors.	Case No.: 03-35592 – D.I. 2770, 2775, 2777, 2779 Case No.: 02-20198 – D.I. 6944, 6961, 6965, 6977 Case No.: 00-22876 – D.I. 8096, 8118, 8120, 8121, 8129
---	--

**MOTION OF GARLOCK SEALING TECHNOLOGIES LLC FOR LEAVE TO FILE A
REPLY IN SUPPORT OF MOTION FOR ORDERS AUTHORIZING ACCESS TO 2019
STATEMENTS FILED IN THIS COURT AND FOR RELATED RELIEF**

Garlock Sealing Technologies LLC (“Garlock”) hereby moves, pursuant to Del. Bankr. L.R. 9006-1(d), for leave to file a reply (the “Reply”) in support of its *Motion for Orders Authorizing Access to 2019 Statements Filed in This Court and for Related Relief* (the “Motion”), and respectfully states as follows:

1. On January 10, 2011, Garlock filed the Motion.
2. On January 28, 2011, The Law Offices of Peter G. Angelos, P.C., Baron & Budd, P.C., Brayton Purcell, LLP, Hissey Kientz, LLP, The Lipman Law Firm, Reaud, Morgan & Quinn, Inc., Thornton & Naumes, LLP, Waters & Kraus, LLP, and Williams Kherkher Hart

Boundas, LLP filed a collective response to the Motion (the “Response of Peter G. Angelos et al.”), and Kazan, McClain, Lyons, Greenwood & Harley, Waters & Kraus LLP, Stanley, Mandel & Iola, L.L.P., Simmons Browder Gianaris Angelides & Barnerd LLC, Bergman, Draper & Frockt, Gori Julian & Associates, P.C., Early, Lucarelli, Sweeney & Strauss, Cooney & Conway, George & Sipes LLP, Lipsitz & Ponterio, LLC, Bifferato LLC, and Montgomery, McCracken, Walker & Rhoads, LLP, filed a collective brief in opposition to the Motion (the “Brief of Kazan McClain et al.”). The Response of Peter G. Angelos et al. is approximately 34 pages and the Brief of Kazan McClain et al. is approximately 25 pages (exclusive of its 7 exhibits). In addition, the Owens Corning debtors and Pittsburgh Corning debtors filed responses on January 28, 2011, and the law firm Motley Rice LLC joined in the other responses on February 3, 2011.

3. In total, over 50 pages of responsive briefing were filed by more than a dozen law firms representing innumerable asbestos plaintiffs. And despite Garlock’s best efforts to anticipate and address all possible arguments against its Motion, the objectors raised arguments that Garlock could not have anticipated. Therefore, Garlock respectfully requests leave to file the Reply attached hereto as **Exhibit A**. Pursuant to this Court’s chambers procedures governing chapter 7 and chapter 11 cases, the Reply, including caption and signatures, is five (5) pages. Garlock submits that the Reply will aid the Court in determining the issues presented by the Motion.¹

4. In addition, pursuant to Del. Bankr. L.R. 7007-2(a)(vii), Garlock has attached, as **Exhibit 1** to the Reply, the *Order Granting Motion of Dow Jones & Company, Inc. to Intervene and Unseal Ad Hoc Noteholder Group’s Rule 2019(a) Disclosures*, entered by the Honorable Brendan L. Shannon on November 16, 2010, in *In re Accuride Corporation*, Case No.

¹ In addition, as a personal accommodation, Garlock agreed not to oppose the filing after the deadline of a response by the Official Committee of Asbestos Personal Injury Claimants in Garlock’s bankruptcy case. Garlock reserves the right to seek leave to reply to new arguments raised therein.

09-13449 (BLS) (the “Accuride Order”). Because the Accuride Order is an unreported decision not available through WESTLAW or LEXIS, Garlock believes its inclusion with the Reply is a requirement of this Court’s Local Rules, and therefore not part of the Reply so as to cause the Reply to exceed this Court’s five-page limitation for replies. *See Del. Bankr. L.R. 7007-2(a)(vii)* (“If an unreported opinion is cited which is neither reported in the National Reporter System nor available on either WESTLAW or LEXIS, a copy of such opinion shall be attached to the document which cites it or shall otherwise be provided to the Court.”). Nonetheless, to the extent necessary, Garlock respectfully requests that the Court permit it to exceed the five-page limit for the Reply to the extent of the Accuride Order.

WHEREFORE, for the foregoing reasons, Garlock respectfully requests that the Court enter the proposed order attached hereto as **Exhibit B**, granting (i) Garlock leave to file the Reply and (ii) such other and further relief as is just and proper under the circumstances.

Dated: February 4, 2011

MORRIS, NICHOLS, ARSHT & TUNNELL LP

By /s/ Gregory W. Werkheiser
Gregory W. Werkheiser
DE Bar No. 3553
Matthew B. Harvey
DE Bar No. 5186

1201 North Market Street, 18th Floor
P.O. Box 1347
Wilmington, DE 19899-1347
Tel: 302-658-9200
Fax: 302-658-3989

DEL SOLE CAVANAUGH STROYD LLC

By /s/ Richard A. Swanson
Arthur H. Stroyd, Jr.
PA ID No. 15910
Richard A. Swanson
PA ID No. 83868

The Waterfront Building
200 First Avenue, Suite 300
Pittsburgh, PA 15222
Tel: 412-261-2393
Fax: 412-261-2110

- and -

Garland S. Cassada
Richard C. Worf, Jr.
ROBINSON, BRADSHAW & HINSON
101 North Tryon Street, Suite 1900
Charlotte, NC 28246
Tel: 704-377-8317
Fax: 704-373-3917

Attorneys for Garlock Sealing Technologies, LLC